

EXHIBIT B

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TQ DELTA, LLC,)	
)	
Plaintiff,)	C.A. No. 13-cv-1835-RGA
)	
v.)	
)	
2WIRE, INC.,)	
)	
Defendant.)	

PARTIES' JOINT STATEMENT OF UNDISPUTED FACTS

The following facts are admitted by the parties and require no proof:

I. The Asserted Patents

1. On November 16, 2010, the United States Patent and Trademark Office issued U.S. Patent No. 7,836,381 (“’381 Patent”), entitled “Computer Readable Medium With Instructions For Resource Sharing In A Telecommunications Environment.”

2. The ‘381 Patent ultimately claims priority to Provisional Application No. 60/618,269, filed on Oct. 12, 2004.

3. The named inventors on the ‘381 Patent are Marcos Tzannes and Michael Lund.

4. On November 30, 2010, the United States Patent and Trademark Office issued U.S. Patent No. 7,844,882 (“’882 Patent”), entitled “Resource Sharing In A Telecommunications Environment.”

5. The ‘882 Patent ultimately claims priority to Provisional Application No. 60/618,269, filed on Oct. 12, 2004.

6. The named inventors on the ‘882 Patent are Marcos Tzannes and Michael Lund.

7. On September 25, 2012, the United States Patent and Trademark Office issued U.S. Patent No. 8,276,048 (“’048 Patent”), entitled “Resource Sharing In A Telecommunications Environment.”

8. The ‘048 Patent ultimately claims priority to Provisional Application No. 60/618,269, filed on Oct. 12, 2004.

9. The named inventors on the ‘048 Patent are Marcos Tzannes and Michael Lund.

10. The ’381, ’882, and ’048 Patents are collectively referred to as the “Asserted Family 3 patents.”

11. TQ Delta, LLC owns the ’381, ’882, and ’048 Patents.

II. The Parties

12. Plaintiff TQ Delta, LLC (“TQ Delta” or “Plaintiff”) is a limited liability company organized and existing under the laws of the State of Delaware and having a principal place of business at 805 Las Cimas Parkway, Suite 240, Austin, Texas 78746.

13. Defendant 2Wire, Inc. (“2Wire” or “Defendant”) was a corporation organized and existing under the laws of the State of Delaware and having a principal place of business at 1764 Automation Parkway, San Jose, California 95131.

14. As of January 1, 2017, 2Wire, Inc. was merged to form ARRIS Solutions, Inc. as a result of a merger between 2Wire, Inc., Aurora Networks, Inc., and ARRIS Solutions Inc.

III. Accused Products

15. 2Wire makes, has made, sells, has sold, offers for sale, has offered for sale, imports, and/or has imported the following products in the United States: [REDACTED]

[REDACTED]

16. The aforementioned products contain the following [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17. The accused products were first sold and offered for sale in the U.S. on or about the following date:

a. [REDACTED]

[REDACTED]

[REDACTED]



IV. Prior Art

18. ITU-T SG/15/Q4 Contribution LB-031, entitled “VDSL2 – Constraining the Interleaver Complexity,” is prior art to the Asserted Family 3 patents.

19. U.S. Patent No. 7,269,208 to Mazzoni *et al.* is prior art to the Asserted Family 3 patents.

20. ITU-T Recommendation G.993.1, entitled “Very high speed digital subscriber line transceivers,” is prior art to the Asserted Family 3 patents.